

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

JESSICA TAYLOR,)	
)	
Plaintiff,)	
)	
v.)	
)	C.A. No. 2:22-cv-03387-DCN
CHARLESTON SOUTHERN)	
UNIVERSITY,)	
)	
Defendant)	
_____)	

DEFENDANT’S DISCLOSURES PURSUANT TO LOCAL CIVIL RULE 26.01

Defendant Charleston Southern University (“Defendant”), by and through its undersigned counsel, provides the following disclosures pursuant Local Civil Rule 26.01:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Response: None known at this time.

B. As to each claim, state whether it should be tried jury or nonjury and why.

Response: Plaintiff has a right to a jury trial on all legal claims, provided Defendant is not entitled to judgment as a matter of law. All equitable claims and issues should be tried nonjury to the extent Defendant is not entitled to judgment as a matter of law.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Response: Defendant is not a publicly owned company and no publicly owned company owns 10% or more of its stock. Defendant is not a parent of any publicly owned company. No publicly owned company owns 10% or more of any outstanding shares.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Response: This matter is properly in the Charleston Division because the state court from which this action was removed and in which this action was commenced is the Charleston County Court of Common Pleas.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.¹

Response: This action is not related to any other matter filed in this District.

F. [Defendants only.] If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Response: Defendant Charleston Southern University is properly identified.

G. [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe in detail the basis of said liability.

¹ This information is required in addition to completion of the "related cases" block on the JS44 Civil Cover Sheet. Although the Civil Cover Sheet requires only that you disclose pending related cases, this interrogatory and this District's assignment procedures require disclosure of any prior or pending related case whether civil or criminal. Therefore, both categories should be disclosed in response to this interrogatory as well as on the JS44 Civil Cover Sheet.

Response: Because it is presently unaware of any person or entity that is liable to Plaintiff, Defendant makes no such contention at this time, but reserves its right to amend this response if necessary.

Respectfully submitted,

s/ Laura A. Ahrens

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***ATTORNEYS FOR DEFENDANT
CHARLESTON SOUTHERN UNIVERSITY***

Dated: September 30, 2022

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JESSICA TAYLOR,)	
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UNIVERSITY,)	
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Defendant)	
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **DEFENDANT'S DISCLOSURES PURSUANT TO LOCAL CIVIL RULE 26.01** was served this day on counsel for Plaintiff via US Mail and ECF to:

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Dated: September 30, 2022

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